LABAT-ANDERSON INCORPORATED

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June 29, 1987

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Mr. Harry Butler CDM. Federal Programs Corporation 13135 Lee Jackson Highway, Suite 200 Fairfax, Virginia 22033

CDM-FPC, NYC

Reference:

EPA Contract No. 68-01-7331

CDM Subcontract No. TESK-TEAM-004

Document No.: 6020-0003-0005

Dear. Mr. Butler:

Enclosed please find for your review a draft of our comments on the endangerment assessment contained in the "Remedial Investigation Report, Asbestos Disposal Sites, Morris County, New Jersey", prepared for the National Gypsum Company by Fred C. Hart, Associates. We find that the endangerment assessment in general follows the relevant guidelines and contains a lot of good information on the sites.

Many of the conclusions of the endangerment assessment seem to be quite appropriate. However, there are important questions regarding potential hazards at the sites that remain unanswered. In particular, we believe that the potential for exposure to asbestos has not been adequately answered for either the airborne or overland runoff pathways for relatively extreme (but still realistic) conditions.

We have performed some preliminary calculations to show the potential importance of these factors, and we expect to do more modeling after discussion of the prelimniary results with EPA Region 2 and a site visit.

Nigel Robinson has asked that we submit comments of the report on or about July 6.

If you have any questions, please call.

Sincerely,

LABAT-ANDERSON Incorporated

Tichea Mightonic
Irea Myslicki

Andrea Myslicki Project Manager

cc:

Bob Goltz Ann Thompson

LAI Contract File 6020